

David G. Hille (*pro hac vice*)  
dhille@whitecase.com  
Kevin C. Adam (*pro hac vice*)  
kevin.adam@whitecase.com  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, NY 10020-1095  
Telephone: (212) 819-8357  
Facsimile: (212) 354-8113

Russell J. Gould (SBN 313352)  
russell.gould@whitecase.com  
WHITE & CASE LLP  
555 S. Flower Street, Suite 2700  
Los Angeles, CA 90071-2433  
Telephone: (213) 620-7700  
Facsimile: (213) 452-2329

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

K.A.,

Plaintiff,

v.

MINDGEEK S.À.R.L., et al.,

Defendants.

Case No. 2:24-cv-04786-WLH-ADS

Hon. Wesley L. Hsu

**DEFENDANTS COLBECK  
CAPITAL MANAGEMENT, LLC;  
CB MEDIA VENTURES DD, LLC;  
CB AGENCY SERVICES, LLC; AND  
CB PARTICIPATIONS SPV, LLC'S  
APPLICATION FOR LEAVE TO  
FILE UNDER SEAL DOCUMENTS  
IN SUPPORT OF THEIR OMNIBUS  
MOTION TO DISMISS**

Pursuant to Local Civil Rule 79-5.2.2(a), Defendants Colbeck Capital Management, LLC; CB Media Ventures DD, LLC; CB Agency Services, LLC; and CB Participations SPV, LLC (collectively, “CB Defendants”) hereby apply for leave to file under seal the following documents:

- Redacted text in the CB Defendants’ Omnibus Motion to Dismiss (“Omnibus Motion to Dismiss”); and
- Exhibits A-B to the Omnibus Motion to Dismiss.

This Application is based on this Application; the Declaration of Kevin C. Adam in Support of the Application; the proposed order granting the Application; and unredacted versions of the documents proposed to be filed under seal.

- The *Omnibus Motion to Dismiss*’ limited redacted text comprises confidential content from Exhibits A-B.
- *Exhibit A* is a Loan Agreement dated April 28, 2011, between various parties, including the CB Defendants and other third-party lenders who participated in loaning money to the MindGeek Borrowers<sup>1</sup> in 2011.
- *Exhibit B* is a Loan Agreement dated October 18, 2013, between various parties, including the CB Defendants and other third-party lenders who participated in loaning money to the MindGeek Borrowers in 2013.

As explained in the Adam Declaration in Support of the Application, compelling reasons exist to seal these documents. The nature and confidentiality of these documents outweigh the public’s interest in access to them.

Pursuant to the Court’s Standing Order (ECF No. 17 at 8) and Local Civil Rule 79-5.2.2(a), counsel for the CB Defendants attempted to confer with counsel for Plaintiffs on October 29, 2024, regarding matters related to this Application. As of the filing of this Application, counsel for Plaintiffs did not yet respond. For

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<sup>1</sup> “MindGeek Borrowers” has the same meaning as defined in the Omnibus Motion to Dismiss.

1 completeness, however, the CB Defendants note that counsel for Plaintiffs previously  
2 indicated they opposed sealing these documents.

3 For the foregoing reasons, the CB Defendants respectfully request that the  
4 Court grant this Application and seal (i) the redacted portions of the CB Defendants'  
5 Omnibus Motion to Dismiss and (ii) Exhibits A-B to the Omnibus Motion to Dismiss  
6 in their entirety.

7 Dated: October 30, 2024

WHITE & CASE LLP

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9 By: /s/ Kevin C. Adam  
10 Kevin C. Adam

11 Attorneys for Defendants  
12 COLBECK CAPITAL  
13 MANAGEMENT, LLC; CB MEDIA  
14 VENTURES DD, LLC; CB AGENCY  
15 SERVICES, LLC; and CB  
16 PARTICIPATIONS SPV, LLC  
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